

March 27, 2019

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, DC 20445

Re: *Bridging the Digital Divide for Low-Income Consumers*, WC Docket No. 17-287;  
*Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42;  
*Telecommunications Carriers Eligible for Universal Service Support*, WC Docket No. 09-197

Dear Ms. Dortch:

On March 25, 2019, I spoke with Nirali Patel, Wireline Advisor to Chairman Pai, regarding Q Link Wireless, LLC's ("Q Link") pending emergency petition for a waiver to permit it to transmit documents in batches to the National Verifier pending the development of carrier APIs.<sup>1</sup> I told Ms. Patel that with the "hard launch" of the National Verifier in Pennsylvania and Missouri on March 5, 2019, Q Link can now no longer add or re-enroll consumers in five states: Colorado, Hawaii, Idaho, Missouri, Pennsylvania and Utah. This irreparably harms not just Q Link, but also the rural consumers in those states that Q Link would otherwise reach.

Q Link's emergency waiver petition was filed November 1, 2018, and now has been pending for nearly five months. And Q Link only filed this petition after its earlier formal and informal requests for the FCC and USAC to act expeditiously to develop a carrier API to avoid the exact problem the waiver addresses were not acted upon in a timely manner. The Commission should not delay further in granting temporary emergency relief.

Granting Q Link's requested waiver would allow these rural consumers to use Q Link's online enrollment to gain access to Lifeline, at no risk to the integrity of the Universal Service Fund. Under Q Link's requested waiver, the National Verifier would remain the sole entity that determines whether a consumer is eligible for Lifeline service. Q Link would simply be helping

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<sup>1</sup> See Petition of Q Link Wireless, LLC for a Limited Waiver to Permit Alternative Transmission of Lifeline Eligibility Information and Customer Certifications to the National Verifier, WC Docket Nos. 17-287, 11-42 & 09-197 (filed Nov. 1, 2018).

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consumers assemble the appropriate documentation, and then transmitting that documentation to the National Verifier.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata  
*Counsel to Q Link Wireless, LLC*

cc: Nirali Patel